

1 THE HONORABLE JOHN COUGHENOUR  
2 Trial Date: June 23, 2025  
3 Moving Party: Joint  
4 Note for Hearing: January 2, 2025  
5 Without Oral Argument

6  
7 UNITED STATES DISTRICT COURT  
8  
9 WESTERN DISTRICT OF WASHINGTON

10 TRACEY SHANFELD, an Individual,

11 Case No. 2:24-cv-00516-JCC

12 Plaintiff,

13 v.

14 EVERGREEN TREATMENT SERVICES, a  
15 Non-Profit Organization,

16 Defendant.

17

18

19

20

21

22

23

24

25

26

**STIPULATED MOTION TO  
CONTINUE TRIAL DATE AND  
AMEND CASE SCHEDULE**

**I. JOINT REQUEST FOR RELIEF**

Plaintiff Tracey Shanfeld and Defendant Evergreen Treatment Services (collectively, the “Parties”) by and through their respective counsel, stipulate and jointly move the Court for an Order continuing the trial date in this matter until at least September 1<sup>st</sup>, 2025, or as soon as possible thereafter, and continuing the court deadlines, including the deadline to change the trial date, the discovery cutoff deadline, and pre-trial deadlines in accordance and in due course to accommodate the new trial date.

**II. FACTS IN SUPPORT OF STIPULATED MOTION**

1. Plaintiff Tracey Shanfeld filed this employment discrimination lawsuit on April

**STIPULATED MOTION TO CONTINUE TRIAL DATE  
AND AMEND CASE SCHEDULE - 1**

Nolan Lim Law Firm, PS  
1111 Third Ave, Suite 1850  
Seattle, WA 98101  
Tel: 206-774-8874  
Fax: 206-430-622

1 16th, 2024.

2 2. On May 3<sup>rd</sup>, 2024, the Court issued a Minute Order reassigning the case to Judge  
3 John C. Coughenour.

4 3. On July 1<sup>st</sup>, the Parties filed a Joint Status Report and Discovery Plan.

5 4. On October 30, 2024, Plaintiff notified Defendant that another trial in Federal Court  
6 presented a direct conflict with the scheduled trial date of this matter via email. Plaintiff has a trial  
7 scheduled for the matter *Stepien vs. Raimondo*, #2:21-cv-01410-LK is scheduled to start on June  
8 16, 2025, with an anticipated 10 court days allocated for trial. This court has set a trial date of June  
9 23, 2025. In *Stepien vs. Raimondo* dispositive motions have already been decided, and settlement  
10 is not imminent.

11 5. The parties have exchanged written discovery.

12 6. The parties have been working in good faith to schedule deposition but due to  
13 scheduling and trial conflicts, depositions have not occurred, but the parties have been diligently  
14 making arrangement to have depositions to take place in late January or early February of 2025.

15 5. The parties conferred via email and jointly agreed that a trial date that occurs on or  
16 after September 1, 2025, would work for the schedules of both parties as an alternative to June 23,  
17 2025.

18 6. Accordingly, the Parties respectfully request that the Court continue the trial date  
19 and case schedule as described below, for good cause:

20 a. Continue the trial date until at least September 1st, 2025, or as soon as  
21 possible thereafter.

22 b. Direct the Clerk of Court to enter an Amended Case Schedule with new  
23 scheduling dates reflecting the new trial date and new litigation deadlines, including the  
24 pre-trial deadlines, in accordance and in due course to accommodate the new trial date.

25 STIPULATED MOTION TO CONTINUE TRIAL DATE  
26 AND AMEND CASE SCHEDULE - 2

Nolan Lim Law Firm, PS  
1111 Third Ave, Suite 1850  
Seattle, WA 98101  
Tel: 206-774-8874  
Fax: 206-430-622

1       7. This stipulation and request to extend the case schedule is made in good faith and  
2 is not for the purposes of undue delay.

3  
4       For the reasons listed above, the Parties respectfully request that the Court grant their Joint  
5 Motion to Continue Trial Date and Amend Case Schedule.

6  
7       IT IS SO STIPULATED this January 2, 2025.

8  
9 IT IS SO STIPULATED.

10     DATED: January 2, 2025

*s/Nolan Lim*  
NOLAN LIM, WSBA # 36830  
Nolan Lim Law Firm  
1111 Third Avenue, Suite 1850  
Seattle, Washington 98101  
Phone: (206) 774-8874  
Email: nolan@nolanlimlaw.com

14     *Counsel for Plaintiff*

15     DATED: January 2, 2025

NORTHCRAFT BIGBY, PC

17     *s/Aaron Bigby*  
Aaron Bigby, WSBA #29271  
819 Virginia St., Suite C-2  
Seattle, WA 98101

20     *Counsel for Defendant*

25 STIPULATED MOTION TO CONTINUE TRIAL DATE  
AND AMEND CASE SCHEDULE - 3

Nolan Lim Law Firm, PS  
1111 Third Ave, Suit e 1850  
Seattle, WA 98101  
Tel: 206-774-8874  
Fax: 206-430-622

## ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED

The parties request for a New trial date and Amended Case Schedule with new associated pretrial deadlines is GRANTED.

DATED: January 2nd, 2025

Joh C Coyne

John C. Coughenour  
United States District Court Judge

**STIPULATED MOTION TO CONTINUE TRIAL DATE  
AND AMEND CASE SCHEDULE - 4**

**Nolan Lim Law Firm, PS**  
1111 Third Ave, Suite 1850  
Seattle, WA 98101  
Tel: 206-774-8874  
Fax: 206-430-622